To: Jacobus, Thomas P WAD[Thomas.P.Jacobus@usace.army.mil]; Shamet, Stefania[Shamet.Stefania@epa.gov]
From: Bemis, James K (Jim) NAB
Sent: Thur 1/29/2015 10:43:36 PM
Subject: RE: One additional thought: Comments on DDOE discharge letter (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: FOUO//SENSITIVE

Stef,

I would add one misconception in the DDOE letter to the list:

While the 2012 bypass may have actually been something like a discharge of 1 year's solids, this discharge was NOT, as DDOE claimed, of "two years of accumulated residual solids." Yes, the solids discharged may have been in Basin 2 may have been there for two years, but a significant amount of the residuals in the basin over the last two years did get dredged and sent back to the processing facility. The problem is a complex one, and the dredging may have been incomplete, but this was not a complete failure of the dredging, nor, if implied, some sort of 'dodge" on the part of the Washington Aqueduct to be allowed to discharge its residuals.

Otherwise, Tom (and you) have both acknowledged the many other issues associated with the letter, including DDOE's failure to recognize these as permit-authorized bypasses.

Respectfully,

Jim

James K. Bemis
Assistant District Counsel
CENAB-OC
P.O. Box 1715
Baltimore, MD 21203-1715
(410) 962-3385
email: jim.bemis@usace.army.mil

UNCLASSIFIED/CONTROLLED UNCLASSIFIED INFORMATION

-----Original Message-----
From: Jacobus, Thomas P WAD
Sent: Thursday, January 29, 2015 4:35 PM
To: Shamet, Stefania
Cc: Bemis, James K (Jim) NAB
Subject: One additional thought: Comments on DDOE discharge letter (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Stef,

I wanted to add one thought to the discussion. On page 4 of the DDOE letter they use a formula to relate TSS and Turbidity. They reference it coming from the 2001 EA Water Quality Study, which I am sure it did. However, we have never done any integral analytical work to demonstrate the accuracy of this

formula across a broad range of particle concentration.

While we are willing and able to do both TSS (using the microwave method) and turbidity (using our Hach bench instrument) I think it would be better to select one technique as the threshold for action. When the basin was fully suspended a week ago I brought back a sample and asked for a TSS analysis. It was 1.38 percent solids which equates to 13,800 mg/lit. Based on that and a some extra water we'll add before use the front end loader to mix it and we take the first sample prior to initiating the discharge I'm confident we will be able to manage a 16,000 mg/L threshold for the discharge of basin #1.

I don't know if we could do this for a basin #2 discharge should that eventually ever occur because basin #2 is so much larger with a different geometric configuration making it impractical to put a bucket loader in it and do what we can do in basin #1.

So for establishing a precedent, if you could make this revision specifically only to basin #1 and allow us to find out how this really works out we could then come up with a basin #2-specific plan should we ever have to discharge basin #2 again with a full load of solids.

Tom
-----Original Message-----
From: Jacobus, Thomas P WAD
Sent: Thursday, January 29, 2015 3:36 PM
To: Shamet, Stefania
Cc: Bemis, James K (Jim) NAB
Subject: Comments on DDOE discharge letter (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Stef,

I've attached a spreadsheet sent to DDOE and the other stakeholder with the analysis of the samples taken during the discharge of Basin #2 in December 2014. That is the chart I make reference to in the notes I've added to DDOE's letter to Jon.

In those notes I did a rough conversion of their pdf to a Word document. I did not attempt to clean up the errors in translation because you have the original document (copy attached) and can read from that one -- but by placing my comments inside that document in "track changes" I thought that would be the best way for you to reference my comments to DDOE's original content.

The final chart on how much we estimated to be in the basins is what DDOE asked for at the beginning of the process and it's the best we can do analytically. To be sure it is not definitive and therefore we should not try to use it as the basis of a formula for limiting the concentration of any future bypass.

I need to leave the office at 5:00 pm to go to the funeral home. I will be back in the office at 6:00 am Friday.

Tom

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE